

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

LUIS A. ACEVEDO GARCIA :
 ANEL ACOSTA MELENDEZ :
 JOSE A. ALVARADO :
 JOSE E. APONTE SOTO :
 JOSE D. APONTE :
 AGUSTINA ARCE ROSADO :
 CLARA AYALA :
 SONIA BERMUDEZ SEPULVEDA :
 JOSE D. BETANCOURT ORTIZ :
 JUAN A. BREBAN CARABALLO :
 ANA L. CABRERA :
 MIGUEL A. CAMACHO DIAZ :
 AURORA CABAN MALDONADO :
 HECTOR CAMACHO ALICEA :
 DOMINGO CARABALLO ORTIZ :
 GABRIEL CARABALLO ORTIZ :
 BRUNILDA CARABALLO RAMOS :
 IVAN CASTRO JIMENEZ :
 LUIS CASTRO RUIZ :
 MIGUEL A. CASTRO RUIZ :
 OBED D. CINTRON :
 SANTA GLORIA CRUZ :
 DAVID CRUZ IRIZARRY :
 GLADYS M. DELGADO PEREZ :
 JUAN DE JESUS APONTE SOTO :
 FERMIN DIAZ SANTIAGO :
 WANDA I. ESTRONZA MARTINEZ :
 ANGEL A. ESTRONZA VELEZ :
 NELLY I. ECHEVARRIA PEREZ :
 HECTOR L. FILIPPETTI SANTIAGO :
 JOSE A. GARCIA :
 JUANITA GONZALEZ ACEVEDO :
 ANTONIO GONZALEZ ALTORO :
 JOSE A. GONZALEZ :
 JACQUELINE GONZALEZ VELEZ :
 JUAN A. HERNANDEZ RAMOS :
 MARIA E. IRIZARRY RODRIGUEZ :
 NORA E. LOPEZ MALDONADO :
 HECTOR L. MADERA LOPEZ :
 LUIS N. MADERA LOPEZ :
 BLANCA I. MALDONADO MOLINA :
 HELGA E. MALDONADO RODRIGUEZ :
 AUREA M. MARTINEZ PEREZ :
 WANDA N. MOLINA ACEVEDO :
 ANGEL MUNET ECHEVARRIA :
 JESUS NOLASCO VELEZ :
 ANTONIO ORTIZ DE JESUS :
 MIGUEL S. OSTOLAZA MIRO :
 MIGDALIA PAGAN REYES :
 LUIS PLAZA GARCIA :
 JOSE A. PLAZA ROSADO :

CIVIL NO. 97-2639 *S*

JURY TRIAL DEMANDED

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SAN JUAN, P.R.
[Signature]

REC'D.	TO JUDGE
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BY <i>[Signature]</i>	# 1

EDWIN ALEXIS PLAZA RUIZ
 JANISSE M. PLAZA RUIZ :
 LUZ N. PEREZ JIMENEZ
 OSCAR QUIÑONES SALCEDO
 LUZ N. RAMIREZ PLAZA :
 EDIRUDIS RAMOS QUIÑONES
 FRANCISCO REYES GONZALEZ
 MIGUEL A. RIVERA GONZALEZ
 IRIS B. RIVERA PEREZ :
 LUZ M. RIVERA SANTIAGO
 HARRY RIVERA TORRES
 JAVIER RIVERA VEGA :
 ARISTIDES RODRIGUEZ QUILES
 JOSE A. RODRIGUEZ SOBA
 HARRY RODRIGUEZ TORRES :
 JOSE H. RODRIGUEZ VEGA
 MARIBEL RODRIGUEZ VEGA
 ELBA I. ROMAN LUCIANO :
 JOSE A. ROMAN TORRES
 JOSE J. ROSADO ALICEA
 ESTHER ROSADO :
 NILDA E. ROSARIO VIROLA
 NORA E. RUIZ GONZALEZ
 RUBEN SALCEDO RODRIGUEZ :
 MIGUEL A. SANTANA PEREZ
 FLOR M. SANTIAGO NIEVES
 JOSE L. SANTIAGO RODRIGUEZ :
 LILLIAN TORRES CABAN
 WANDA I. TORRES LARACUENTE
 AWILDA TORRES NATAL :
 VILMA TORRES RIVERA
 LILIAN TORRES NATAL
 NORMA VAZQUEZ DE ZAYAS :
 ELIZABETH VELEZ CARABALLO
 EDWIN R. VELEZ PLAZA
 ISABEL VELEZ SEPULVEDA :
 MARTHA ZAYAS VAZQUEZ

PLAINTIFFS

VS.

HON. ROBERTO VERA MONROIG, :
 INDIVIDUALLY AND AS MAYOR OF
 ADJUNTAS, MUNICIPALITY OF ADJUNTAS :
 IRMA M. GONZALEZ DELGADO
 INDIVIDUALLY AND AS PERSONNEL :
 DIRECTOR OF ADJUNTAS

DEFENDANTS

COMPLAINT

TO THE HONORABLE COURT:

COME NOW the plaintiffs by the undersigned attorneys, and allege the following:

INTRODUCTION

1. This is an action for declaratory and injunctive relief, for compensatory damages, for punitive damages for violation of the constitutional and statutory rights of plaintiffs by defendants under the constitution and laws of the United States and Puerto Rico.

JURISDICTION

2. This action is brought pursuant to 42 U.S.C., Sections 1983 and 1988, and the First, Fifth and/or Fourteenth Amendments to the United States Constitution. Jurisdiction is founded upon 28 U. S. C. 1331 and 1343 (3) and (4), and the aforementioned statutory and constitutional provisions. Venue of this action is proper under 28 U. S. C. 1391.

3. Plaintiffs further invoke the supplemental jurisdiction of the Court to hear and decide claims arising under the laws of Puerto Rico.

PARTIES

4. Plaintiffs are citizens of the United States of America, residents of the Commonwealth of Puerto Rico, of legal age, were regular or career employees of the Municipal Government of Adjuntas, Puerto Rico, that were all harassed, dismissed by the

defendants, for political discriminatory reasons, by way of letters signed by the defendant Mayor Honorable Roberto Vera Monroig, effective October 15, 1997, from the Municipal positions that are indicated as follows:

- 4.1 Plaintiff Luis A. Acevedo, was dismissed by the defendants for political discriminatory reasons from the position of Assistant Collector.
- 4.2 Plaintiff Anel Acosta Melendez, was dismissed by the defendants for political discriminatory reasons from the position of Citizens Affairs Technician.
- 4.3 Plaintiff José A. Alvarado, was dismissed by the defendants for political discriminatory reasons from the position of Driver.
- 4.4 Plaintiff José E. Aponte Soto, was dismissed by the defendants for political discriminatory reasons from the position of Cemetery Administrator.
- 4.5 Plaintiff José D. Aponte was, dismissed by the defendants for political discriminatory reasons from the position of Citizens Affairs Technician.
- 4.6 Plaintiff Agustina Arce Rosado, was dismissed by the defendants for political discriminatory reasons from the position of Citizens Affairs Technician.
- 4.7 Plaintiff Clara Ayala, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.
- 4.8 Plaintiff Sonia Bermudez Sepulveda, was dismissed by the defendants for political discriminatory reasons from the

position of Practical Nurse.

4.9 Plaintiff José D. Betancourt, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.10 Plaintiff Juan A. Breban Caraballo, was dismissed by the defendants for political discriminatory reasons from the position of Cleaning Supervisor.

4.11 Plaintiff Ana L. Cabrera, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.12 Plaintiff Miguel A. Camacho Díaz, was dismissed by the defendants for political discriminatory reasons from the position of Public Works Driver.

4.13 Plaintiff Aurora Caban Maldonado, was dismissed by the defendants for political discriminatory reasons from the position of Practical Nurse.

4.14 Plaintiff Héctor Camacho Alicea, was dismissed by the defendants for political discriminatory reasons from the position of Worker I.

4.15 Plaintiff Domingo Caraballo Ortiz, was dismissed by the defendants for political discriminatory reasons from the position of Carpenter.

4.16 Plaintiff, Gabriel Caraballo Ortiz, was dismissed by the defendants for political discriminatory reasons from the position of Carpenter.

4.17 Plaintiff Brunilda Caraballo Ramos, was dismissed by the

defendants for political discriminatory reasons from the position of Citizens Help Technician.

4.18 Plaintiff Ivan Castro Jiménez, was dismissed by the defendants for political discriminatory reasons from the position of Bulldozer Operator.

4.19 Plaintiff Luis Castro Ruíz, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.20 Plaintiff Miguel A. Castro Ruiz, was dismissed by the defendants for political discriminatory reasons from the position of Accountant Assistant.

4.21 Plaintiff Obed D. Cintron, was dismissed by the defendants for political discriminatory reasons from the position of Finance Assistant Director.

4.22 Plaintiff Santa Gloria Cruz, was dismissed by the defendants for political discriminatory reasons from the position of Laundress.

4.23 Plaintiff David Cruz Irizarry, was dismissed by the defendants for political discriminatory reasons from the position of Janitor.

4.24 Plaintiff Gladys M. Delgado Perez, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.25 Plaintiff Juan De Jesús Aponte Soto, was dismissed by the defendants for political discriminatory reasons from the position of Public Works Assistant.

4.26 Plaintiff Fermín Díaz Santiago, was dismissed by the

defendants for political discriminatory reasons from the position of Clerk.

4.27 Plaintiff Wanda I. Estronza Martínez, was dismissed by the defendants for political discriminatory reasons from the position of Secretary.

4.28 Plaintiff Angel A. Estronza Vélez, was dismissed by the defendants for political discriminatory reasons from the position of Loader Operator.

4.29 Plaintiff Nelly I. Echevarría Perez, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.30 Plaintiff Héctor L. Filippetti Santiago, was dismissed by the defendants for political discriminatory reasons from the position of Driver.

4.31 Plaintiff José A. García, was dismissed by the defendants for political discriminatory reasons from the position of Driver.

4.32 Plaintiff Antonio González Altoro, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.33 Plaintiff Juanita González Acevedo, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.34 Plaintiff José A. Gonzalez, was dismissed by the defendants for political discriminatory reasons from the position of Practical Nurse.

4.35 Plaintiff Jacqueline González Vélez, was dismissed by the defendants for political discriminatory reasons from the position of Administrative Assistant.

- 4.36 Plaintiff Juan A. Hernández Ramos, was dismissed by the defendants for political discriminatory reasons from the position of Federal Programs Deputy Director.
- 4.37 Plaintiff María E. Irizarry Rodríguez, was dismissed by the defendants for political discriminatory reasons from the position of Recreational and Sports Clerk.
- 4.38 Plaintiff Nora E. López Maldonado, was dismissed by the defendants for political discriminatory reasons from the position of Children Park Administrator.
- 4.39 Plaintiff Hector L. Madera López, was dismissed by the defendants for political discriminatory reasons from the position of Sports Supervisor.
- 4.40 Plaintiff Luz N. Madera López, was dismissed by the defendants for political discriminatory reasons from the position of Sports Deputy Director.
- 4.41 Plaintiff Blanca I. Maldonado Molina, was dismissed by the defendants for political discriminatory reasons from the position of Practical Nurse.
- 4.42 Plaintiff Helga E. Maldonado Rodríguez, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.
- 4.43 Plaintiff Aurea M. Martínez Rivera, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.
- 4.44 Plaintiff Wanda N. Molina Acevedo, was dismissed by the defendants for political discriminatory reasons from the position of Secretary III.

- 4.45 Plaintiff Angel Munet Echevarría, was dismissed by the defendants for political discriminatory reasons from the position of Construction Supervisor.
- 4.46 Plaintiff Jesus Nolasco Vélez, was dismissed by the defendants for political discriminatory reasons from the position of Citizenship Help Technician.
- 4.47 Plaintiff Antonio Ortiz De Jesús, was dismissed by the defendants for political discriminatory reasons from the position of Janitor.
- 4.48 Plaintiff Miguel S. Ostolaza Miró, was dismissed by the defendants for political discriminatory reasons from the position of Cleaning Deputy Director.
- 4.49 Plaintiff Migdalia Pagán Reyes, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.
- 4.50 Plaintiff Luis Plaza García, was dismissed by the defendants for political discriminatory reasons from the position of Workers Supervisor.
- 4.51 Plaintiff José A. Plaza Rosado, was dismissed by the defendants for political discriminatory reasons from the position of Computer Technician.
- 4.52 Plaintiff Edwin Alexis Plaza Ruíz, was dismissed by the defendants for political discriminatory reasons from the position of Administrative Assistant.
- 4.53 Plaintiff Janisse M. Plaza Ruíz, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.54 Plaintiff Luz N. Pérez Jiménez, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.55 Plaintiff Oscar Quiñones Salcedo, was dismissed by the defendants for political discriminatory reasons from the position of Vehicle Conductor (Driver).

4.56 Plaintiff Luz N. Ramirez Plaza, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.57 Plaintiff Edirudis Ramos Quiñones, was dismissed by the defendants for political discriminatory reasons from the position of Secretary.

4.58 Plaintiff Francisco Reyes González, was dismissed by the defendants for political discriminatory reasons from the position of Driver.

4.59 Plaintiff Miguel A. Rivera González, was dismissed by the defendants for political discriminatory reasons from the position of Public Works Driver.

4.60 Plaintiff Iris B. Rivera Pérez, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.61 Plaintiff Luz M. Rivera Santiago, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.62 Plaintiff Harry Rivera Torres, was dismissed by the defendants for political discriminatory reasons from the position of Community Services Coordinator.

- 4.63 Plaintiff Javier Rivera Vega, was dismissed by the defendants for political discriminatory reasons from the position of Citizens Affairs Technician.
- 4.64 Plaintiff Arístides Rodríguez Quiles, was dismissed by the defendants for political discriminatory reasons from the position of Citizens Affairs Technician.
- 4.65 Plaintiff José A. Rodríguez Soba, was dismissed by the defendants for political discriminatory reasons from the position of Public Works Deputy Director.
- 4.66 Plaintiff Harry Rodríguez Torres, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.
- 4.67 Plaintiff José H. Rodríguez Vega, was dismissed by the defendants for political discriminatory reasons from the position of Administrative Assistant.
- 4.68 Plaintiff Maribel Rodríguez Vega, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.
- 4.69 Plaintiff Elba I. Román Luciano, was dismissed by the defendants for political discriminatory reasons from the position of Stenographer Clerk I.
- 4.70 Plaintiff José A. Román Torres, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.
- 4.71 Plaintiff José J. Rosado Alicea, was dismissed by the defendants for political discriminatory reasons from the position of Maintenance Keeper.

4.72 Plaintiff Esther Rosado, was dismissed by the defendants for political discriminatory reasons from the position of Practical Nurse.

4.73 Plaintiff Nilda E. Rosario Virola, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.74 Plaintiff Nora E. Ruiz González, was dismissed by the defendants for political discriminatory reasons from the position of Assistant Warehouse Watchman.

4.75 Plaintiff Rubén Salcedo Rodríguez, was dismissed by the defendants for political discriminatory reasons from the position of Driver.

4.76 Plaintiff Miguel A. Santana Pérez, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.77 Plaintiff Flor M. Santiago Nieves, was dismissed by the defendants for political discriminatory reasons from the position of Public Relations Officer.

4.78 Plaintiff José L. Santiago Rodríguez, was dismissed by the defendants for political discriminatory reasons from the position of Assistant Collector.

4.79 Plaintiff Lillian Torres Caban, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.80 Plaintiff Wanda I. Torres Laracuenta, was dismissed by the defendants for political discriminatory reasons from the position of Secretary III.

4.81 Plaintiff Awilda Torres Natal, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

4.82 Plaintiff Vilma Torres Rivera, was dismissed by the defendants for political discriminatory reasons from the position of Assistant Warehouse Watchman.

4.83 Plaintiff Lillian Torres Natal, was dismissed by the defendants for political discriminatory reasons from the position of Practical Nurse.

4.84 Plaintiff Norma Vazquez De Zayas, was dismissed by the defendants for political discriminatory reasons from the position of Public Relations Officer.

4.85 Plaintiff Elizabeth Vélez Caraballo, was dismissed by the defendants for political discriminatory reasons from the position of Stenographer Clerk.

4.86 Plaintiff Edwin R. Vélez Plaza, was dismissed by the defendants for political discriminatory reasons from the position of Recreational Complex Deputy Director.

4.87 Plaintiff Isabel Velez Sepulveda ,was dismissed by the defendants for political discriminatory reasons from the position of Children Park Deputy Administrator.

4.88 Plaintiff Martha Zayas Vazquez, was dismissed by the defendants for political discriminatory reasons from the position of Clerk.

5. Defendant Roberto Vera Monroig, is and was, at all times relevant to this Complaint, the Mayor of the Municipality of Adjuntas, a position he assumed on January 14, 1997. As Mayor of Adjuntas, he formulates, implements, direct, the public policy in

relation to the administration of the personnel of the Municipality of Adjuntas.

6. Defendant Irma M. González Delgado is and was, at all times relevant to this Complaint, the Personnel Director of the Municipality of Adjuntas, a trust or confidence position, appointed by the Mayor Honorable Roberto Vera Monroig, a member of his Staff. As Personnel Director he also formulates, implements, the public policy in relation to the administration of the Personnel of the Municipality of Adjuntas.

7. Defendant the Municipality of Adjuntas is a Public Autonomous Corporation of the Commonwealth of Puerto Rico, created by Law #81 of August 30, 1991 as amended, known as the Puerto Rico Autonomous Municipal Governments Law, that has capacity to sue and be sued, and is responsible in this type of action for violations of Civil Rights, under the Constitutions of the United States of America and of the Commonwealth of Puerto Rico.

8. At all times relevant hereto and in the actions described herein, the Individual defendants Identified above were acting under color of law and under their authority as employees, elected officials and/or appointed officials of the Municipality of Adjuntas, Puerto Rico. They are sued in this case in their individual and official capacities.

9. All Plaintiffs are active members and/ or affiliates of the New Progressive Party, from here on referred to as the N. P. P.

10. All defendants are active members and/or affiliates of the Popular Democratic Party, from here on referred to as the P.D.P.

11. The P.D.P. and the New Mayor of Adjuntas, defendant Roberto Vera Monroig, won in the recent Elections held on November 1996, in Puerto Rico, the power or control of the Municipality of Adjuntas.

12. The N.P.P. won in the last Elections, of November, in Puerto Rico, the State Control or power, including the Executive and Legislative Powers of the Commonwealth of Puerto Rico.

13. The dismissals of the plaintiffs by the defendants Roberto Vera Monroig, the Municipality of Adjuntas and Irma M. Gonzalez Delgado, for political discriminatory reasons violated plaintiffs' Constitutional Rights, of freedom of expression and association, due process and others, specifically the First, Fifth and Fourteenth Amendments of the Constitution of the United States of America.

14. The dismissals of the plaintiffs by the defendants Roberto Vera Monroig, the Municipality of Adjuntas and Irma M. González Delgado, for political unlawful employment discriminatory reasons, also were a violation of the Federal Civil Rights Act 42 USC, 1983, 1988.

15. The aforementioned actions and/or omissions of defendants Roberto Vera Monroig the Municipality of Adjuntas and Irma M. González Delgado, cause plaintiffs loss of income, loss of and/or damage to their credit and severe emotional sufferings and mental anguish, due to their dismissals, transfers humiliations, and harassments they were subjected to, culminating in their unlawful dismissals, from employment since October 15, 1997.

16. The acts and conduct of the defendants Roberto Vera Monroig the Municipality of Adjuntas, and Irma M. González Delgado,

named herein, constitute violations of Article II, Sections 1, 2, 4, 6, 7, 16, 19 and 20 of the Constitution of the Commonwealth of Puerto Rico and of the prohibition of discrimination, based upon political beliefs established by Puerto Rico's Laws 100, 29 L.P.R.A. § 146, as amended. This Court has supplemental jurisdiction to hear and adjudicate these claims.

17. The economic losses, humiliations, mental distresses and emotional sufferings suffered, by the plaintiffs because of the actions of defendants Roberto Vera Monroig, the Municipality of Adjuntas, and Irma M. González Delgado, constitute tortious conduct for which said defendants are liable to the plaintiffs pursuant to Articles 1802 and 1803 of the Civil Code of Puerto Rico, 31 L.P.R.A. §§ 5141, 5142. This court has supplemental jurisdiction to hear and adjudicate these claims.

PRAYER OF RELIEF

WHEREFORE, it is respectfully requested that this Honorable Court enter judgment in favor of the plaintiffs, allowing the following relief, jointly and severally, against defendants Roberto Vera Monroig, the Municipality of Adjuntas and Irma M. González Delgado.

1. A declaration that the acts and omissions by defendants Roberto Vera Monroig, the Municipality of Adjuntas, and Irma M. González Delgado, complained of were illegal, unlawful and unconstitutional.

2. Issuing a Permanent Injunction, reinstating all plaintiffs to their positions from which they were dismissed, effective October 15, 1997, and further ordering defendants Roberto Vera Monroig, the Municipality of Adjuntas, and Irma M. González

Delgado as follows:

- (a) to provide plaintiffs with double back pay for the entire period for which they were impeded from earning their regular salaries from October 15, 1997, through the date upon which said order is issued;
- (b) provide plaintiffs, retroactively insofar as applicable, with all privileges and benefits to which they would have been entitled had they not been unlawfully terminated.

3. ORDER defendants Roberto Vera Monroig, the Municipality of Adjuntas and Irma M. González Delgado, to compensate each of the plaintiffs for their mental and emotional damages, compensatory and special damages in a cumulative amount of no less than \$1,000,000.00, per plaintiff of this case.

4. ORDER defendants Roberto Vera Monroig, the Municipality of Adjuntas and Irma M. González Delgado, to pay each of the plaintiffs punitive damages in an amount in excess of \$500,000.00 each per plaintiff.

5. ORDER that defendants Roberto Vera Monroig, the Municipality of Adjuntas and Irma M. González Delgado, compensate plaintiffs for reasonable attorneys' fees and costs generated by this litigation.

6. ORDER that defendants Roberto Vera Monroig, the Municipality of Adjuntas and Irma M. González Delgado, pay plaintiffs prejudgment interests on all the aforementioned amounts.

7. ORDER such other and further relief as may appear just and reasonable.

A JURY TRIAL IS HEREBY DEMANDED.

In San Juan, Puerto Rico, this 10 day of November 1997.

OATH

We LUIS A. ACEVEDO GARCIA; ANEL ACOSTA MELENDEZ; JOSE A. ALVARADO; JOSE E. APONTE SOTO; JOSE D. APONTE; AGUSTINA ARCE

ROSADO; CLARA AYALA; SONIA BERMUDEZ SEPULVEDA; JOSE D. BETANCOURT ORTIZ; JUAN A. BREBAN CARABALLO; ANA L. CABRERA; MIGUEL A. CAMACHO DIAZ; AURORA CABAN MALDONADO; HECTOR CAMACHO ALICEA; DOMINGO CARABALLO ORTIZ; GABRIEL CARABALLO ORTIZ; BRUNILDA CARABALLO RAMOS; IVAN CASTRO JIMENEZ; LUIS CASTRO RUIZ; MIGUEL A. CASTRO RUIZ; OBED D. CINTRON; SANTA GLORIA CRUZ; DAVID CRUZ IRIZARRY; GLADYS M. DELGADO PEREZ; JUAN DE JESUS APONTE SOTO; FERMIN DIAZ SANTIAGO; WANDA I. ESTRONZA MARTINEZ; ANGEL A. ESTRONZA VELEZ; NELLY I. ECHEVARRIA PEREZ; HECTOR L. FILIPPETTI SANTIAGO; JOSE A. GARCIA; JUANITA GONZALEZ ACEVEDO; ANTONIO GONZALEZ ALTORO; JOSE A. GONZALEZ; JACQUELINE GONZALEZ VELEZ; JUAN A. HERNANDEZ RAMOS; MARIA E. IRIZARRY RODRIGUEZ; NORA E. LOPEZ MALDONADO; HECTOR L. MADERA LOPEZ; LUIS N. MADERA LOPEZ; BLANCA I. MALDONADO MOLINA; HELGA E. MALDONADO RODRIGUEZ; AUREA M. MARTINEZ PEREZ; WANDA N. MOLINA ACEVEDO; ANGEL MUNET ECHEVARRIA; ANTONIO ORTIZ DE JESUS; MIGUEL S. OSTOLAZA MIRO; MIGDALIA PAGAN REYES; LUIS PLAZA GARCIA; JOSE A. PLAZA ROSADO; EDWIN ALEXIS PLAZA RUIZ; JANISSE M. PLAZA RUIZ; LUZ N. PEREZ JIMENEZ; OSCAR QUIÑONES SALCEDO, LUZ N. RAMIREZ PLAZA; EDIRUDIS RAMOS QUIÑONES; FRANCISCO REYES GONZALEZ; MIGUEL A. RIVERA GONZALEZ; IRIS B. RIVERA PEREZ, LUZ M. RIVERA SANTIAGO; HARRY RIVERA TORRES; JAVIER RIVERA VEGA; ARISTIDES RODRIGUEZ QUILES; JOSE A. RODRIGUEZ SOBA; HARRY RODRIGUEZ TORRES; JOSE H. RODRIGUEZ VEGA; MARIBEL RODRIGUEZ VEGA; ELBA I. ROMAN LUCIANO; JOSE A. ROMAN TORRES; JOSE J. ROSADO ALICEA; ESTHER ROSADO; NILDA E. ROSARIO VIROLA; NORA E. RUIZ GONZALEZ; RUBEN SALCEDO RODRIGUEZ; MIGUEL A. SANTANA PEREZ, FLOR M. SANTIAGO NIEVES; JOSE L. SANTIAGO RODRIGUEZ; LILLIAN TORRES CABAN; WANDA I. TORRES LARACUENTE; AWILDA TORRES NATAL; VILMA TORRES RIVERA;

LILIAN TORRES NATAL; NORMA VAZQUEZ DE ZAYAS; ELIZABETH VELEZ CARABALLO; EDWIN R. VELEZ PLAZA; ISABEL VELEZ SEPULVEDA; MARTHA ZAYAS VAZQUEZ; JESUS NOLASCO VELEZ,, of legal age, citizens of the United States of America, residents of the Commonwealth of Puerto Rico, dismissed, transferred, non renewed in their Contracts and/or harassed employees of the Municipal Government of Adjuntas, Puerto Rico, under oath depose and state:

1. That our names and personal circumstances are as above stated.

2. That the allegations of this Complaint are the truth, according to our best knowledge and understanding of the reality herein described.

In San Juan, Puerto Rico, this 18 of October of 1997.

Luis A. Acevedo Garcia
LUIS A. ACEVEDO GARCIA

Jose A. Alvarado
JOSE A. ALVARADO

Jose D. Aponte Rivera
JOSE D. APONTE

Clara M. Ayala Satomayor
CLARA AYALA

Jose D. Betancourt Ortiz
JOSE D. BETANCOURT ORTIZ

Ana L. Cabrera Cabán
ANA L. CABRERA

Aurora Cabán Maldonado
AURORA CABAN MALDONADO

Domingo Caraballo Ortiz
DOMINGO CARABALLO ORTIZ

Anel Acosta Melendez
ANEL ACOSTA MELENDEZ

Jose E. Aponte Soto
JOSE E. APONTE SOTO

Agustina Arce Rosado
AGUSTINA ARCE ROSADO

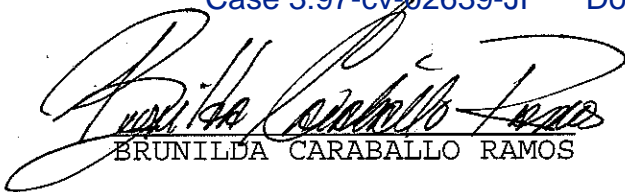
Sonia Bermudez Sepulveda
SONIA BERMUDEZ SEPULVEDA

Juan A. Breban Caraballo
JUAN A. BREBAN CARABALLO

Miguel A. Camacho Diaz
MIGUEL A. CAMACHO DIAZ

Hector Camacho Alicea
HECTOR CAMACHO ALICEA

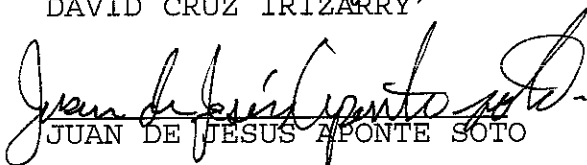
Gabriel Caraballo Ortiz
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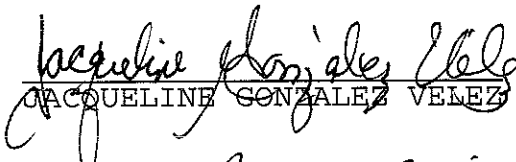

JUAN DE JESUS APONTE SOTO


WANDA I. ESTRONZA MARTINEZ

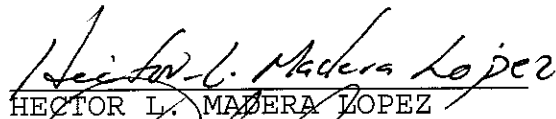

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MIGUEL A. CASTRO RUIZ

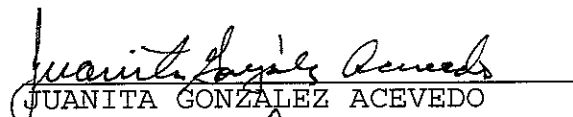

SANTA GLORIA CRUZ


GLADYS M. DELGADO PEREZ


FERMIN DIAZ SANTIAGO


ANGEL A. ESTRONZA VELEZ


HECTOR L. FILIPPETTI SANTIAGO


JUANITA GONZALEZ ACEVEDO


JOSE A. GONZALEZ


JUAN A. HERNANDEZ RAMOS


NORA E. LOPEZ MALDONADO

~~HECTOR L. MADERA LOPEZ~~


BLANCA I. MALDONADO MOLINA


AUREA M. MARTINEZ PEREZ

Wanda N. Molina Acevedo
WANDA N. MOLINA ACEVEDO

Antonio Ortiz de Jesus
ANTONIO ORTIZ DE JESUS

~~MISDALLIA TACAN REYES~~

Jose A. Plaza Rosado
JOSE A. PLAZA ROSADO

Janisse M. Plaza Ruiz
JANISSE M. PLAZA RUIZ

Oscar Quintana Salcedo
OSCAR QUINTANA SALCEDO

Edirudis Ramos Quinones
EDIRUDIS RAMOS QUINONES

Miguel A. Rivera
MIGUEL A. RIVERA

Luz M. Rivera Santiago
LUZ M. RIVERA SANTIAGO

Javier Rivera Vega
JAVIER RIVERA VEGA

~~JOSE A. RODRIGUEZ SOBA~~

Jose A. Rodriguez Vega
JOSE A. RODRIGUEZ VEGA

Elba I. Roman Luciano
ELBA I. ROMAN LUCIANO

Jose J. Rosado Alicea
JOSE J. ROSADO ALICEA

Angel Munet Echevarria
ANGEL MUNET ECHEVARRIA

Miguel A. Ostolaza Miro
MIGUEL A. OSTOLAZA MIRO

Luis Plaza Garcia
LUIS PLAZA GARCIA

Edwin Alexis Plaza Ruiz
EDWIN ALEXIS PLAZA RUIZ

Luz N. Perez Jimenez
LUZ N. PEREZ JIMENEZ

Luz N. Ramirez Plaza
LUZ N. RAMIREZ PLAZA

~~FRANCISCO REYES SONTALEZ~~

Iris B. Rivera Perez
IRIS B. RIVERA PEREZ

Harry Rivera Torres
HARRY RIVERA TORRES

Aristides Rodriguez Quiles
ARISTIDES RODRIGUEZ QUILES

Harry Rodriguez Torres
HARRY RODRIGUEZ TORRES

Maribel Rodriguez Vega
MARIBEL RODRIGUEZ VEGA

Jose A. Roman Torres
JOSE A. ROMAN TORRES

Esther Rosado
ESTHER ROSADO

Nilda E. Rosario Viola
NILDA E. ROSARIO VIROLA

Ruben Salcedo Rodriguez
RUBEN SALCEDO RODRIGUEZ

Flor M. Santiago Nieves
FLOR M. SANTIAGO NIEVES

Lillian Torres Cabán
LILLIAN TORRES CABAN

Awilda Torres Natal
AWILDA TORRES NATAL

Lillian Torres Natal
LILLIAN TORRES NATAL

Elizabeth Velez Caraballo
ELIZABETH VELEZ CARABALLO

Isabel Velez Sepulveda
ISABEL VELEZ SEPULVEDA

Jesus Nolasco Velez
JESUS NOLASCO VELEZ

Nora E. Ruiz Gonzalez
NORA E. RUIZ GONZALEZ

Miguel A. Santana Perez
MIGUEL A. SANTANA PEREZ

Jose L. Santiago Rodriguez
JOSE L. SANTIAGO RODRIGUEZ

Wanda I. Torres Lora Cuente
WANDA I. TORRES LARACUENTE

Vilma Torres Rivera
VILMA TORRES RIVERA

Norma Vazquez de Zayas
NORMA VAZQUEZ DE ZAYAS

Edwin R. Velez Plaza
EDWIN R. VELEZ PLAZA

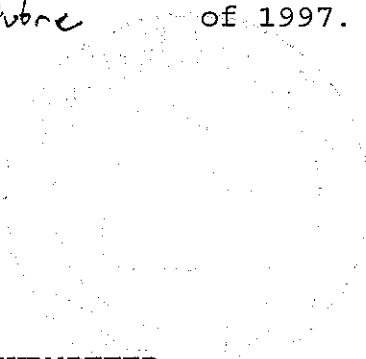

Martha Zayas Vazquez
MARTHA ZAYAS VAZQUEZ

AFF. NO: 020

Sworn and subscribed to before me by LUIS A. ACEVEDO GARCIA;
ANEL ACOSTA MELENDEZ; JOSE A. ALVARADO; JOSE E. APONTE SOTO; JOSE
D. APONTE; AGUSTINA ARCE ROSADO; CLARA AYALA; SONIA BERMUDEZ
SEPULVEDA; JOSE D. BETANCOURT ORTIZ; JUAN A. BREBAN CARABALLO; ANA
L. CABRERA; MIGUEL A. CAMACHO DIAZ; AURORA CABAN MALDONADO; HECTOR
CAMACHO ALICEA; DOMINGO CARABALLO ORTIZ; GABRIEL CARABALLO ORTIZ;
BRUNILDA CARABALLO RAMOS; IVAN CASTRO JIMENEZ; LUIS CASTRO RUIZ;
MIGUEL A. CASTRO RUIZ; OBED D. CINTRON; SANTA GLORIA CRUZ; DAVID
CRUZ IRIZARRY; GLADYS M. DELGADO PEREZ; JUAN DE JESUS APONTE SOTO;
FERMIN DIAZ SANTIAGO; WANDA I. ESTRONZA MARTINEZ; ANGEL A. ESTRONZA

VELEZ; NELLY I. ECHEVARRIA PEREZ; HECTOR L. FILIPPETTI SANTIAGO; JOSE A. GARCIA; JUANITA GONZALEZ ACEVEDO; ANTONIO GONZALEZ ALTORO; JOSE A. GONZALEZ; JACQUELINE GONZALEZ VELEZ; JUAN A. HERNANDEZ RAMOS; MARIA E. IRIZARRY RODRIGUEZ; NORA E. LOPEZ MALDONADO; HECTOR L. MADERA LOPEZ; HERIBERTO MADERA LOPEZ; LUIS N. MADERA LOPEZ; BLANCA I. MALDONADO MOLINA; HELGA E. MALDONADO RODRIGUEZ; AUREA M. MARTINEZ PEREZ; WANDA N. MOLINA ACEVEDO; ANGEL MUNET ECHEVARRIA; ANTONIO ORTIZ DE JESUS; MIGUEL A. OSTOLAZA MIRO; MIGDALIA PAGAN REYES; LUIS PLAZA GARCIA; JOSE A. PLAZA ROSADO; EDWIN ALEXIS PLAZA RUIZ; JANISSE M. PLAZA RUIZ; LUZ N. PEREZ JIMENEZ; OSCAR QUINTANA SALCEDO; LUZ N. RAMIREZ PLAZA; EDIRUDIS RAMOS QUIÑONES; FRANCISCO REYES GONZALEZ; MIGUEL A. RIVERA; IRIS B. RIVERA PEREZ, LUZ M. RIVERA SANTIAGO; HARRY RIVERA TORRES; JAVIER RIVERA VEGA; ARISTIDES RODRIGUEZ QUILES; JOSE A. RODRIGUEZ SOBA; HARRY RODRIGUEZ TORRES; JOSE A. RODRIGUEZ VEGA; MARIBEL RODRIGUEZ VEGA; ELBA I. ROMAN LUCIANO; JOSE A. ROMAN TORRES; JOSE J. ROSADO ALICEA; ESTHER ROSADO; NILDA E. ROSARIO VIROLA; NORA E. RUIZ GONZALEZ; RUBEN SALCEDO RODRIGUEZ; MIGUEL A. SANTANA PEREZ, FLOR M. SANTIAGO NIEVES; JOSE L. SANTIAGO RODRIGUEZ; LILLIAN TORRES CABAN; WANDA I. TORRES LARACUENTE; AWILDA TORRES NATAL; VILMA TORRES RIVERA; LILIAN TORRES NATAL; NORMA VAZQUEZ DE ZAYAS; ELIZABETH VELEZ CARABALLO; EDWIN R. VELEZ PLAZA; ISABEL VELEZ SEPULVEDA; MARTHA ZAYAS VAZQUEZ; JESUS NOLASCO VELEZ, of the personal circumstances

above stated, and who I personally know in Adjuntas, Puerto Rico,
this 18 of October of 1997.

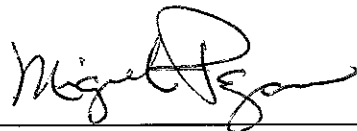


NOTARY PUBLIC

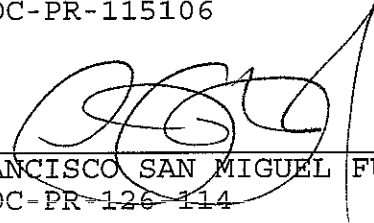
RESPECTFULLY SUBMITTED:

In San Juan, Puerto Rico, this 10 of November of 1997.

PAGAN & PAGAN
555 Cabo Alverio St.
San Juan, Puerto Rico 00918
Tel. 758-2584/ 753-0479
Fax 758-7938

BY:


MIGUEL PAGAN
USDC-PR-115106


FRANCISCO SAN MIGUEL FUXENCH
USDC-PR-126-114

OATH

I, Jose A. Rodriguez Sobá, of legal Age, SOCIAL SECURITY NUMBER 583-60-3775, citizen of the United States of America, resident of the Commonwealth of Puerto Rico, dismissed employee of the Municipal Government of Adjuntas, Puerto Rico, under oath depose and state:

1. That my name and personal circumstances are as above as stated.

2. That the allegations in the Complaint are the truth, according to my best knowledge and undersanding of the reality herein described.

In, San Juan, Puerto Rico, this 16th of October of 1997.

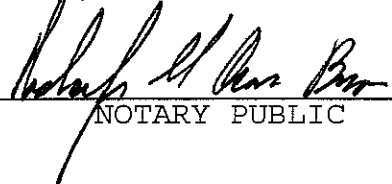
T.A.M.S.

JOSE A. RODRIGUEZ SOBA

AFF. NUM. 019

Sworn and suscribed to before me by JOSE A. RODRIGUEZ SOBA, of the personal circumstances above stated, and who I personally know in San Juan, Puerto Rico, this 16 of October, 1997.




NOTARY PUBLIC

OATH

I, Francisco Reyes Gonzalez, of legal age, Social Security Number 581-20-9541, citizen of the United States of America, resident of the Commonwealth of Puerto Rico, dismissed employee of the Municipal Government of Adjuntas, Puerto Rico, under oath depose and state:

1. That my name and personal circumstances are as above as stated.

2. That the allegations in the Complaint are the truth, according to my best knowledge and understanding of the reality herein describe.

In San Juan, Puerto Rico, this 22th of October of 1997.

Francisco Reyes Gonzalez
FRANCISCO REYES GONZALEZ

AFF. NO: 028

Sworn and suscribed to before me by FRANCISCO REYES GONZALEZ, the personal circumstances above stated, and who I personally know in San Juan, Puerto Rico, this 22 of October 1997.



Notary Public
NOTARY PUBLIC

OATH

I, Migdalia Pagán Reyes, of legal age, Social Security Number 582-08-3464, citizen of the United States of America, resident of the Commonwealth of Puerto Rico, dismissed employee of the Municipal Government of Adjuntas, Puerto Rico, under oath depose and state:

1. That my name and personal circumstances are as above as stated.

2. That the allegations in the Complaint are the truth, according to my best knowledge and understanding of the reality herein described.

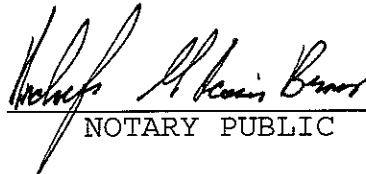
In San Juan, Puerto Rico, this 29th of October of 1997.


MIGDALIA PAGAN REYES

AFF. NO: 029

Sworn and suscribed to before me by MIGDALIA PAGAN REYES, the personal circumstances above stated, and who I personally know in San Juan, Puerto Rico, this 29 of October 1997.




NOTARY PUBLIC